



17 October 2025

[REDACTED]
Victorian Planning Authority
1 Spring St.
Melbourne VIC 3000

Via email: ballaratnorth@vpa.vic.gov.au

Dear [REDACTED],

RE: Ballarat North Precinct Structure Plan – Dennis Family Corporation Submission to draft Amendment C256ball to the Ballarat Planning Scheme

This letter sets out submissions by the Dennis Family Corporation (DFC) in response to proposed Amendment C256ball to the Ballarat Planning Scheme. The draft amendment introduces the Ballarat North Precinct Structure Plan (PSP), the Ballarat North Development Contributions Plan (DCP) and Ballarat North Native Vegetation Precinct Plan (NVPP) to guide growth in this area over the next 20 to 30 years.

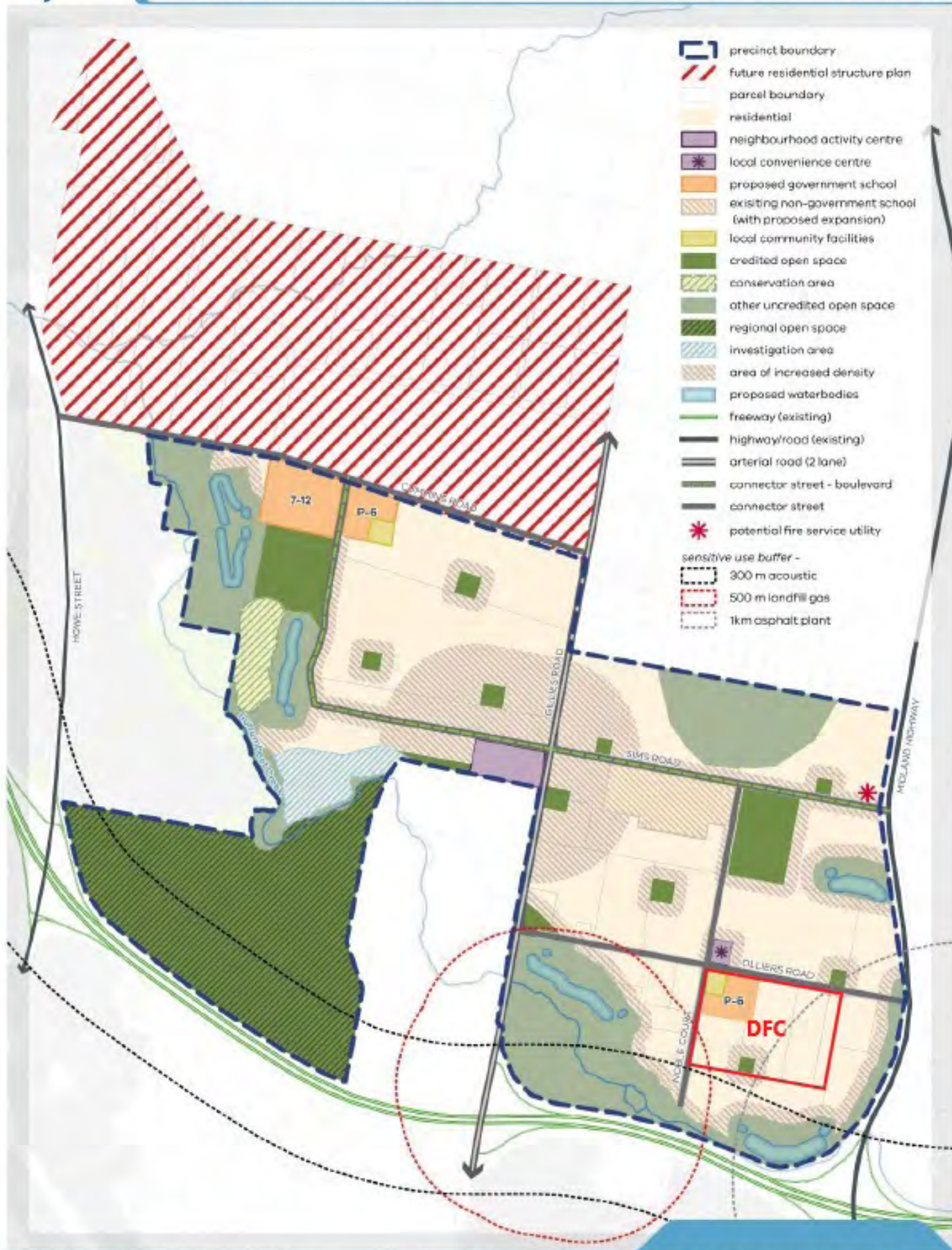
We congratulate the VPA on preparing the amendment documents for consultation and the work done to date, in collaboration with Council and other agencies.

DFC have actively engaged with the VPA throughout the preparation of the PSP, and we thank the VPA for the opportunity to provide comments on the draft Amendment C256ball - the Ballarat North PSP.

Dennis Family Corporation (DFC)

DFC is recognised as one of Australia's leading privately owned residential land developers, managing master planned communities in both Victoria and South-East Queensland. We have significant experience building successful greenfield communities throughout the greater Melbourne area, as well as several projects across regional Victoria.

DFC has an interest in 23.2 ha of land at [REDACTED] and [REDACTED]. The land is situated within the Ballarat North PSP area, as Identified in **Figure 1** overleaf. These parcels are identified as Properties numbers 70, 71, 72 and 73 in the PSP land use budget.



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Figure 1 - Ballarat North PSP - Plan 2: Place-Based Plan – DFC land outlined in red.

Submission Items

Following our review of the draft Amendment documents, we have identified the following submission items for consideration by the VPA:

1. Location of proposed government school and community centre sites.
2. Affordable (and Social Housing) targets.
3. Development Contribution Plan - upgrades to the Midland Highway, connector roads and apportionment.
4. Infrastructure and Development Staging.
5. Burrumbeet Creek Housing Area.
6. Noble Court upgrade.
7. Miscellaneous Sustainability and Environmental items.
8. Native Vegetation Precinct Plan.
9. Proposed Environmental Audit Overlay (EAO).
10. Sensitive Use Buffer - Landfill Gas Buffer.

1. Location of proposed government school and community centre sites.

The *Plan 2 - Place Based Plan* in the PSP identifies a proposed government school (in orange, labelled P-6) with a co-located local community facility (yellow) and credited open space (green) on the DFC land, as show in **Figure 2**, below.



Figure 2: PSP Plan 2: Place Based Plan (Detail) – DFC Land outlined in red

DFC seeks the relocation of the proposed government school and the community facility to the north of Olliers Road. In our view, the location proposed by the VPA is suboptimal, being located excessively south and east of the surrounding residential catchments for these facilities. Relocation of the proposed school and community facility to land further north will better centre the facilities relative to the surrounding residential catchment. This will optimise access to the government primary school and council community facility from surrounding residences.

DFC have developed an alternative plan that demonstrates our proposal to relocate the combined government primary school and community facility (red rectangle) to the property north-west of the DFC land. From our GIS analysis, we calculate that the DFC proposal captures an additional 18.5 ha of residential land (or approximately 370 dwellings) within the catchments for these facilities (red buffers). We note that this is a conservative estimate as the DFC proposal also includes a substantial portion of the higher density 'amenity area' associated with the central activity centre (See **Figure 5**, below). Our initial estimates indicate that the PSP Performance Summary targets identified in Figure 4 would increase in the proximity of 5-10%

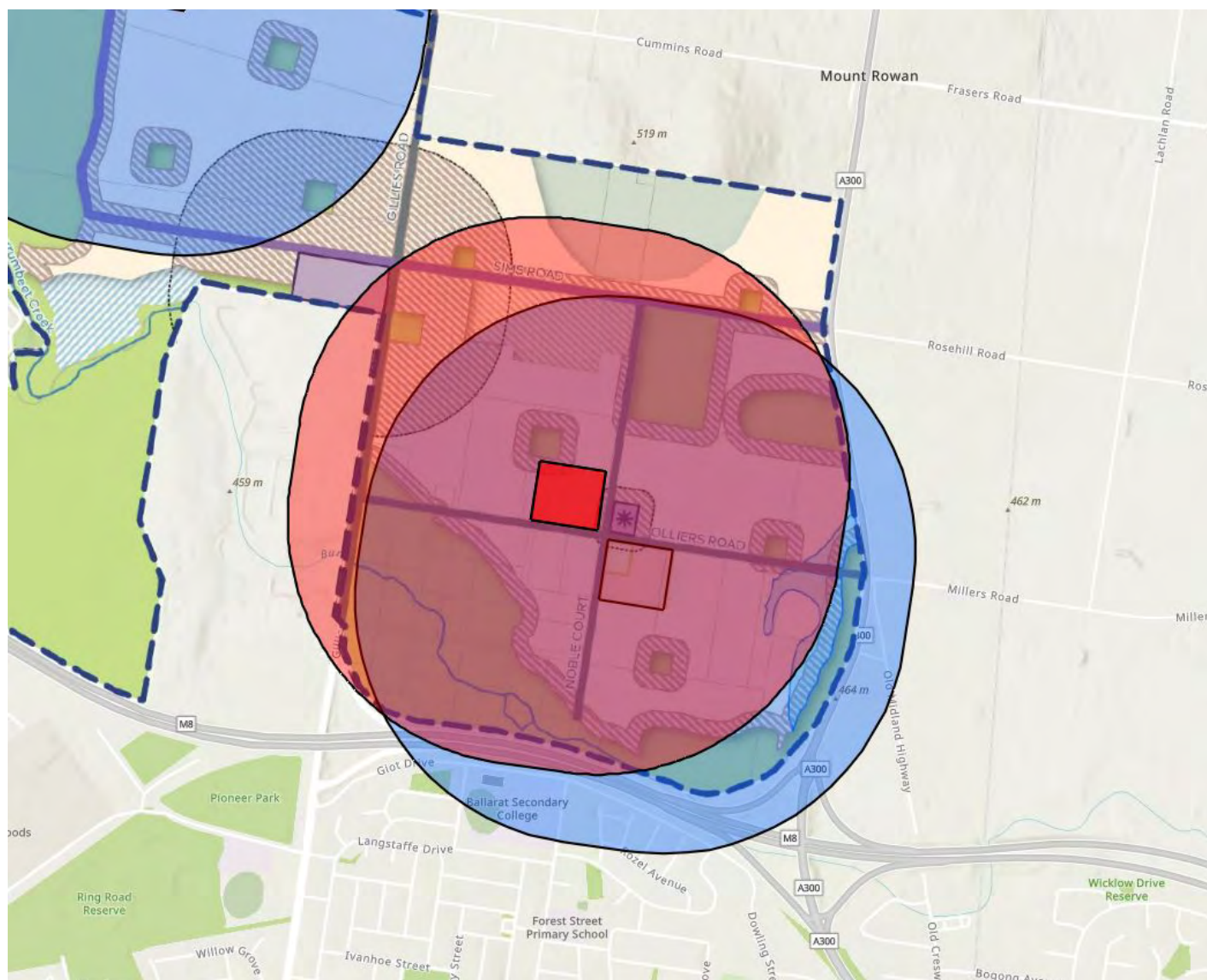


Figure 5: DFC Plan demonstrating improved residential catchments for relocated community infrastructure

We believe that there is ample space to place the primary school and community facility on the north-western property and not be impacted by the Heritage Overlay that is proposed to be placed over the existing dwelling on site.

Co-Design Summary Report and Place Based Plan

DFC staff attended the Ballarat North Co-Design session held by the VPA on 17 July 2024 in Ballarat. It was our observation that most participants at the session identified the preferred locations for the proposed government school and community facility to the north of Olliers Road. Indeed, this is how the sessions were reported in the Co-Design report (See **Figure 6**, below left), as compared with the final location chosen for the school in the Place-Based Plan (See **Figure 6**, below right).



Figure 6: Co-design Report - Place shaper kit plan vs place-based plan

No commentary is provided in the *Co-Design Summary* document (October 2024) to explain this apparent discrepancy in plans, nor the decision-making process that led to the VPA locating the school on DFC land. It is DFC's understanding that the VPA was directed by the Department of Education to locate the school site on land owned by active developers as 'developers are reputedly easier to negotiate with'.

If this is the case, then this position contradicts the Department's own *Victorian Government School Site Selection Criteria – Toolbox*, which provides guidance for parties wishing to understand the department's site selection and school planning processes. Site acquisition and ownership is discussed at *General Principle No. 17: Reduce complication associated with site acquisition*. It lists under the heading, Greenfield Requirement; 'Should be owned by one sole owner / developer'. There is no guidance indicating a preference for developer-owned land over that of non-developer owned land.

DFC embraces and supports the placement of schools and other social infrastructure within our developments in the right circumstances. DFC projects have a long running history of having successful government school sites located upon our land, including the Manor Lakes P-12 and the Hunt Club primary and secondary schools to name a few. However, in this instance we don't believe the placement of a primary school upon our site is a sound planning outcome.

DFC plans to develop its estate of up to 400 dwellings within 5-7 years. We expect this will pre-date the land acquisition and construction of the proposed government (primary) school which typically services a residential catchment of 3,000 dwellings. If DFC is required to set aside the school and community centre site, this will reduce the project's residential yield by about 85 lots and will necessitate DFC holding the school site for many years following completion of the estate. This is a poor outcome as it sterilises otherwise development ready land, that will be able to supply housing to the Ballarat market and appears to unfairly penalise DFC.

Put simply, in circumstances where DFC's proposed relocation of the government primary school and primary facility will achieve a better planning outcome, significant weight should be given to DFC's ability to bring those additional 85 dwellings to the market in the short term.

There is no cogent planning basis for DFC's request in this regard to be dismissed.

Submission 1

DFC seek the relocation of the government primary school and community facility CI-02 to the north-west of Olliers Road to better serve the surrounding residential catchment.

2. Affordable (and Social Housing) targets

Guideline G2 of the PSP states that 'Applications for residential subdivision and development should demonstrate how they contribute to the target of 13% minimum of affordable housing generally in accordance with the Ballarat North Housing Needs Assessment'. *Table 5 - Affordable housing delivery guidance* (p.17) further differentiates the affordable housing targets as 2% subsidised market housing and 11% social housing.

DFC are not supportive of the attempt to impose social housing targets (11%) within the overall affordable housing target. The imposition of social housing targets is unwarranted in our view and will have a profound impact on the development feasibility of the project.

Private developers can deliver targeted affordable market housing using mechanisms available to them, including rationalising lot land area and partnering with volume builders to deliver small lot and attached housing at reduced construction costs. Thus, DFC can accept the imposition of market-based affordable housing targets - to a limited degree. However, it is our firm view that the provision of social housing is the remit of the State Government and that the provision of social housing should not be imposed upon private developers.

Our concerns are further compounded by the overlaying of prescribed guidance for bedroom typologies across affordable housing income bands in *Table 5 - Affordable housing delivery guidance* (p.17). Achieving these kinds of bespoke dwelling bedroom outcomes is largely outside our control as land developers, responsible for delivering subdivision of land to the market and not the built form outcomes.

Submission 2

DFC oppose the imposition of a 11% minimum social housing target, within a broader affordable housing target of 13%. We seek the deletion of the social housing target from Table 5, along with any prescriptive guidance for income band and bedroom typology targets.

3. DCP - upgrades to the Midland Highway, connector roads and apportionment

Upgrades to Midland Highway

The Precinct Infrastructure Plan (PIP) that accompanies the PSP includes upgrades to the Midland Highway as it runs along the eastern boundary of the PSP, including two new 4-way, signalised intersections (See **Figure 7**, below).



Figure 7: DCP Plan 3 Transport Projects (Detail, North Point to right)

Specific projects of relevance to this section of the highway are summarised below:

PIP Reference No.	Description	Component included in DCP	Timing	Apportionment to DCP	Total Project Cost recovered by DCP
RD-02-1	Duplication of Midland Highway (Southern section)	Ultimate land and construction	Short	100%	\$5,912,684.05
RD-02-2	Duplication of Midland Highway (Northern section)	Ultimate land and construction	Medium	100%	\$8,474,847.14
IN-04	Midland Highway and Olliers Road Intersection	Ultimate land and construction	Short	100%	\$6,235,742.12
IN-05	Midland Highway and Sims Road Intersection	Ultimate land and construction	Long/ Medium	100%	\$6,235,742.12

Combined, these four projects equal \$26,859,015.40 (or some \$98,125.89 \$/NDHa) and constitute 47.5 % of all transport project costs in the DCP.

The DCP thus includes:

- Duplication of an extent of state highway.
- Improvements to raise the existing road above the 1:100 flood level.
- 100% apportionment of all works (including intersections) to the DCP area.

While we accept the need for upgrades to the Midland Highway brought about increased traffic generation from urbanisation of the Ballarat North precinct, we do not agree with the proposed scope of these works, nor the **full apportionment** of costs for these projects as proposed in the draft DCP.

We note that many of the infrastructure costs in the DCP are based upon generic placeholder designs and will be updated with bespoke costs when they become available. Nevertheless, we contend that several assumptions underpinning inclusion of these items in the DCP are not appropriate and contravene accepted guidelines, particularly equity and nexus with the proposed development:

- It is highly unusual for a PSP to require duplication of a State controlled road. Typically, DCPs cover construction/upgrade of a first carriageway and not duplication of state roads. Further, the current road is flood-prone and clearly not fit-for-purpose as presently constructed. This is an existing issue and not one caused by development of the PSP. We assert that this is inequitable as rectification of these failures should be the responsibility of the road owner and not the precinct's developer.
- The assumption of 100% apportionment does not appear to consider traffic generated by other external development, e.g., traffic growth from towns to the north, industrial development and the new showgrounds to the east of Midland Hwy. The Strategic Transport Modelling Assessment Report (Jacobs, July 2025) reports that approximately 60% of the future traffic on the Midland Highway (immediately north of the Western Freeway) is attributable to the PSP (p.50). We fail to understand how the DCP can propose full (100%) apportionment given that the proposed development contributes only 60% of the forecast traffic growth on this road to 2051.

DCP – Connector Roads

Requirement R30 of the PSP specifies that the subdivider is responsible for the costs of all roads not provided by the Precinct DCP, as well as intersection works and traffic management measures along arterial roads, connector streets, and local streets. This is reinforced in the DCP at Section 2.5 which identifies items not included in the DCP, including:

- Connector streets and local streets.
- Intersection works and traffic management measures along arterial roads, connector streets and local street (except those included in the DCP).

While it is common practice that connector roads and connector road intersections are not included in a DCP, there are many instances where these costs are included to ensure an equitable sharing of the reconstruction costs for these larger-scale roads and intersections.

We assert that this approach should be adopted in the PSP in relation to existing council roads, i.e., Olliers Road, Noble Court, as well as local intersections on these connector roads (i.e. intersection of Olliers Road and Noble Court).

If this approach is not implemented then it is likely that any first acting developer who develops a subdivision that takes access from these roads, will be required to fund the costs to reconstruct these roads and intervening intersections to achieve urban connector road standard. This is inequitable and will allow later acting developers to benefit from these upgrades without providing any funding or contributions towards them.

Thus, we contend that costs to upgrade any existing council roads to connector road status should be included in the DCP to ensure equitable sharing of costs between developers.

This issue of equity is only compounded by reference to the 100% DCP cost apportionment of the proposed Midland Highway works as addressed above.

DCP – Apportionment

Table 7 Calculation of costs – Development Infrastructure Levy (DIL) (p. 32) in the DCP shows that the Level 2 Community Facility CI-02 is to be 50% funded by the DCP, while the Level 1 Community CI-01, which sits peripheral to the north-western catchment of the PSP is 100% apportioned to the DCP. This is clearly a mistake and should be corrected so that costs for CI-02 are 100% apportioned to the DCP and CI-01 are 50% to DCP and 50% to investigation area.

The Background Report (for Public Consultation) makes clear at Section 4.8.2 Development Contributions Plan (DCP) – infrastructure items, that the VPA Position is that 'Where projects service both precincts equally, these are apportioned 50% to the core area and 50% to the expanded area' (p.57).

Submission 3

DFC request the following amendments to the DCP infrastructure project tables and costs (Table 7 - Calculation of costs – Development Infrastructure Levy (DIL):

- *Reduce the 100% apportionment of DCP items RD-02-1 & RD-02-2 based upon traffic modelling evidence that factors in growth in traffic from areas outside the PSP (i.e. to 60% based on the Jacobs report).*
- *Items RD-02-1 & RD-02-2 should not include costs associated with mitigating the current impacts of flooding on the Midland Highway.*
- *Reduce the 100% apportionment of DCP items IN-04 & IN-05 based upon traffic generation evidence that considers traffic growth from areas outside the PSP (i.e. to 60% based on the Jacobs report).*
- *Include connector road and connector road intersection upgrades to existing council roads in the DCP to ensure equitable sharing of costs of reconstruction between developers and to avoid inadvertently penalising first-acting developers.*
- *Correct apportionment of CI-01 to 50% to DCP and 50% to investigation area, and CI-02 to show 100% apportionment of costs to the DCP.*

4. Infrastructure and Development Staging

Staging Plan

DFC is broadly supportive of the VPA's attempts to identify key enabling infrastructure for the PSP, particularly significant items of precinct drainage and transport that will enable development across early stages of the PSP. Requirement R27 of the PSP deals with the staging of infrastructure and development across the delivery of the PSP. It requires staging of specified infrastructure items to be generally in accordance with *Plan 10 - Infrastructure and Development Staging*, the timings for precinct infrastructure listed in Table 19, as well as requiring timely provision of a broad list of other key infrastructure - all to the satisfaction of the Responsible Authority. Considered together, R27 identifies many infrastructure items and as such it is confusing to interpret which items are a 'priority' for delivery.

Plan 10 (page 41) identifies a limited subset of infrastructure items associated with Stage 1 and thus appears to identify infrastructure items to be delivered as priorities, or enabling infrastructure, in the style of other recent PSP Infrastructure and development staging plans. It appears that their delivery should be prioritised, but this is not borne out in the PSP text.

Figure 8 below, shows localised detail from Plan 10 that encompasses the Stage 1 area (purple) and highlighted DCP infrastructure in dark blue.



Figure 8: PSP Plan 10 Infrastructure and Development Staging (Stage 1 - Detail)

In summary, the identified infrastructure items are:

Transport projects:		PIP Timing
RD-01-1	Gillies Road over Burrumbeet Creek	Short
RD-01-2	Gillies Road urbanization	Medium
IN-01	Gillies Road and Olliers Road	Short
IN-04	Midland Highway and Olliers Road (over tributary to Burrumbeet Creek)	Short
Drainage projects:		
DR-01	Constructed Waterway tributary to Burrumbeet Creek (CW1)	Short
WL-05	Wetland & Retarding Basin (SES)	Short

Further information can be gleaned from the Background Report (for Public Consultation) at Section 4.8.1 and Appendix 2 - Infrastructure and Development Staging Plan Report. It identifies assumptions (p.81) that:

- Projects identified (in Plan 10) to be delivered in a stage are assumed will be delivered by developers through Works in Kind (WIK) arrangements.
- That developers will forward fund the cost of constructing the infrastructure and offset against their future DCP monetary contribution, and
- That this assumption relies on developer eagerness and ability to deliver projects through WIK arrangements.

The Transport and Drainage projects identified in Plan 10 are identified in Step 4 – Preparation of Infrastructure and Development Staging Plan (IDSP) – DCP Projects (p.83), as “required to be delivered in this Stage” (i.e. Stage 1). This guidance needs to be translated into the PSP document to aid interpretation of Plan 10.

Interim and Ultimate Transport Projects

There remains, however, the question of whether and under what circumstances transport infrastructure works may be delivered as interim works (assuming that they are delivered as ultimate works before the completion of development of Stage 1). We believe the PSP should include a requirement specifying conditions around ultimate and interim construction for transport projects, equivalent to Requirement R28, which provides such guidance for waterway and drainage infrastructure.

Facilitating Early Drainage Works

DFC is also of the view that the PSP should go further to ensure the early delivery of those key drainage projects identified in Plan 10: DR-01 and WL-05. We are concerned that as the projects are effectively landlocked, their construction is subject to the whim of a single landholder. If the landholder is not active and these projects are not delivered early, this will compromise the ability of all other landholders in the region to develop fully and lead to a reliance on individual, costly and inefficient interim drainage infrastructure.

To mitigate these risks, it is our strong view that the land for items DR-01 and WL-05, (including any overland flow paths/ pipeline connections to neighbouring properties) should be safeguarded by the application of Public Acquisitions Overlays (PAOs). This approach will enable responsible authorities to access the subject land if a landholder is not in the position to develop. We note that such an approach has been recently undertaken by the VPA in the East of Aberline PSP to enable Council to obtain timely access to land along the Russells Creek waterway corridor.

Incorporating PAOs for land associated with items DR-01 and WL-05 will reinforce implementation of the Infrastructure and Development Staging Plan. This measure also provides assurance to both developers and authorities that the PSP can progress in a timely and orderly manner.

Submission 4

DFC seek greater clarity (in the form of Requirements and Guidelines) regarding implementation of Plan 10 in the PSP. We seek:

- *Clear identification of those infrastructure items that must be developed by completion of each stage.*
- *Inclusion of guidance regarding possible interim works that can be undertaken on DCP Transport items identified in Plan 10 of the PSP.*
- *Application of PAOs to the land footprint for infrastructure items DR-01 and WL-05 (including pipeline linkages to adjacent parcels) to enable early delivery of these items by relevant authorities in the case where the landholder is not in the position to develop.*

5. Burrumbeet Creek Housing Area

Plan 3 Housing (p.18) of the PSP includes a legend entry denoting the “Burrumbeet Creek Housing Area”. This is not defined or discussed further in the PSP. It is, however, addressed in the Specific provisions section of the proposed Urban Growth Zone – Schedule 3 (UGZ3).

Section 2.4 Specific provisions – Subdivision of the UGZ3 requires that a permit must not be granted to subdivide land within the Burrumbeet Creek Housing Area until a range of plans and strategies are completed for the entire sub-precinct, to the satisfaction of the responsible authority and Glenelg Hopkins Catchment Management Authority (GHCMA). As the Burrumbeet Creek Housing Area impacts multiple properties it will require coordination across landholders as well as the RA and the GHCMA. In our view, this will present challenges at subdivision and form an additional impediment to development.

The Specific provision appears to relate to flooding associated with the northern tributary to Burrumbeet Creek. The PIP identifies this stretch of waterway to be upgraded as constructed waterway DR-01 (See **Figure 9** below) and the DCP itemises a cost of \$6,838,954.61 for these works. From discussions with the VPA it is understood that the GHCMA do not support reconstruction of this stretch of tributary and rather, seek retention in its present state. Thus, it appears that Section 2.4 of the UGZ3 has been introduced in an attempt to resolve the contradiction between retention and reconstruction of this length of the tributary.

However, we do not support the use of Specific provisions to resolve this issue and seek instead it’s resolution via an updated, precinct wide stormwater study, or potentially expert conclaves that could be held during the SAC process. The Specific provision will necessitate coordination of additional work across affected landholders and may stall if the landholder who controls the land affected is not an active developer. This will create significant delays in approvals for land in the south-eastern subregion of the PSP, which is otherwise identified as the first stage of the PSP to develop.



Figure 9: PSP Plan 3 Housing (Detail)

Submission 5

The Specific provision - Burrumbeet Creek Housing Area - listed at Section 2.4 of the UGZ should be deleted as it is unwieldy and will cause significant delays to development. In its place we request that the precinct-wide stormwater management study is updated, or that a roundtable / conclave process is held as part of the SAC to resolve the specific issue for this stretch of tributary, rather than being left for landholders to try to prosecute as part of their subdivision applications.

6. Noble Court upgrade

It is DFC's view that Noble Court, south of Olliers Road does not need to be constructed as a bus capable connector road, as shown in Plan 4 Movement Network of the PSP (see **Figure 10** below). The road does not form part of any obvious and continuous bus route. Nor is it necessary for the network to achieve performance targets, as most dwellings south of Olliers Road lie within 400m of potential public transport services along that road.

For this reason, we believe that Noble Court could be reconstructed as a lower-level access road (with the addition of an off-road shared path, if so required).



Figure 10: PSP Plan 4: Movement Network (Detail) with 400m arrow from Olliers Road

Submission 6

Remove the bus capable designation from Noble Court (south of Olliers Road) and downgrade to an access level road.

7. **Miscellaneous Sustainability and Environmental Requirements**

Requirement R38 - Sustainable Subdivision Framework (SSF)

The SSF (<https://www.casbe.org.au/resources/sustainable-subdivisions-resources/>) replicates many of the provisions of Clause 56, as well as requirements and guidelines in the PSP. It is overly onerous as many of its measures relate to post-subdivisional outcomes that cannot be estimated at the time of a subdivision application.

Guideline G45 - Provision of neighbourhood scale renewable energy generation and storage within the precinct

It is difficult to see how individual developers can implement this “neighbourhood” wide guideline at subdivision level. There are many unknowns including responsibilities for creation, maintenance and ownership of assets.

We suggest, instead, that if this approach is to be pursued in the precinct, it will need an active sponsor, i.e. an energy utility provider. This can be undertaken outside the subdivision approval process.

UGZ3 – 3.0 Application Requirements

The following application requirements are overly aspirational, onerous and exceed current subdivisional environmental performance standards.

- Residential ESD subdivision and housing design guidelines.
- Zero Carbon Operational Energy Plan.

These will be extremely costly to implement and difficult to achieve, thereby delaying development and increasing the cost of land for future purchasers.

Submission 7

Delete the following Requirements and Guidelines as they are unjustified and will introduce additional complexity and cost for subdivisions within the PSP:

- *Delete Requirement R38.*
- *Delete Guideline G45.*
- *Delete application requirements:*
 - *Residential ESD subdivision and housing design guidelines.*
 - *Zero Carbon Operational Energy Plan.*

8. **Native Vegetation Precinct Plan (NVPP)**

The Ballarat North NVPP prepared by WSP indicates that DFC’s western-most parcel provided “no access” and was therefore not surveyed at the time of the ecological assessment. Figure 8.2 of the NVPP does not show any vegetation mapped on property 70 so it appears that the property has been excluded from the NVPP, although this is not spelt out in the NVPP. Refer to **Figure 11** overleaf.

For DFC, this will mean that vegetation on the majority of the land will be managed in accordance with the NVPP (via Cl. 52.16), while a planning permit application will be required for vegetation removal on property 70 under Cl 52.17 of the Ballarat Planning Scheme. This is a sub-optimal planning outcome given that DFC intend to apply for a planning permit for subdivision of the entire land holding.

To avoid this situation, DFC in consultation with the VPA seek to undertake a biodiversity assessment for property 70. This work can be completed in early 2026 prior to commencement of the SAC process.

Upon completion, DFC respectfully request that the VPA updates the NVPP to incorporate the findings of this additional assessment. This will mean that the NVPP operates in a streamlined fashion over our entire property, as it is intended to do.

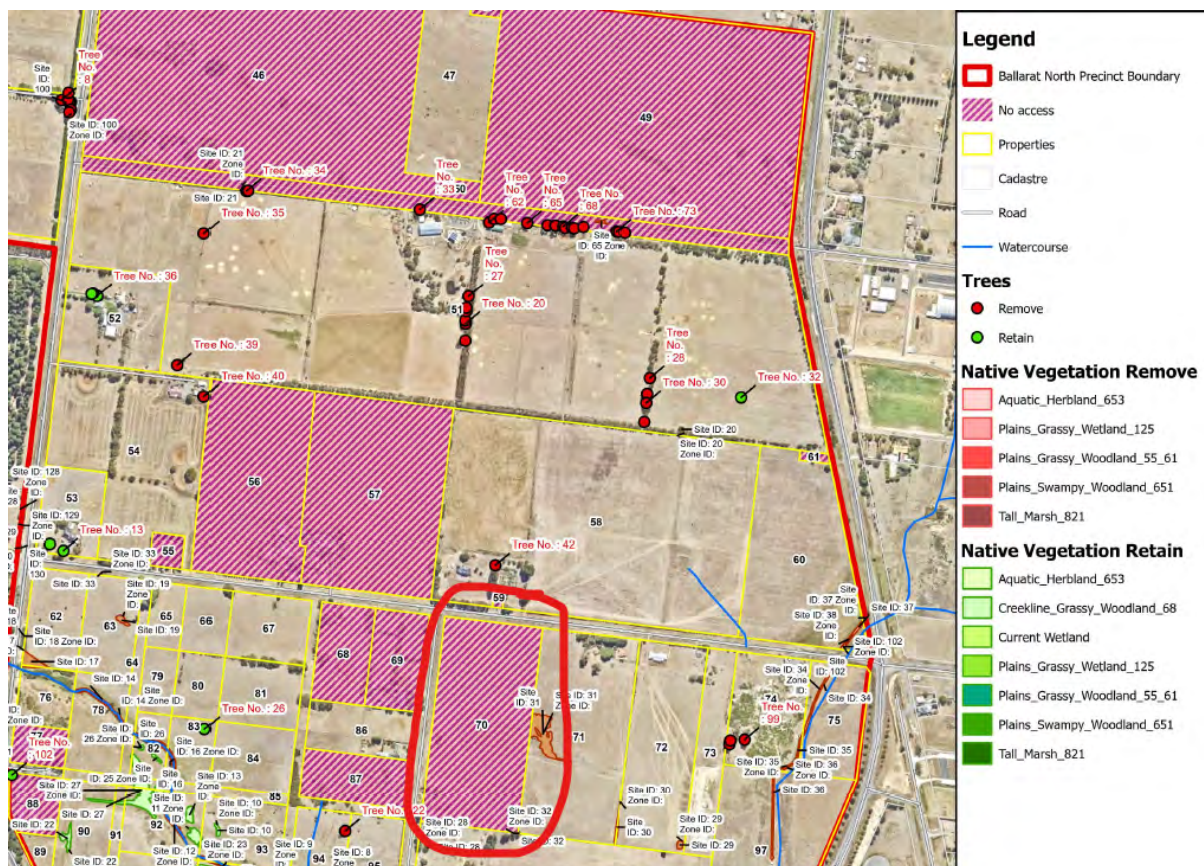


Figure 11: NVPP Figure 2: Native Vegetation to be removed and retained (WSP)

Submission 8

DFC request that the VPA update the Ballarat North NVPP to incorporate the findings of an additional biodiversity assessment undertaken for Property 70 in the NVPP.

9. Proposed Environmental Audit Overlay (EAO)

The draft amendment documents include a proposed Environmental Audit Overlay (EAO) applied to the DFC landholdings. As previously discussed with the VPA, DFC is presently undertaking an environmental audit to clean up the entirety of the land to be suitable for sensitive uses. It is anticipated that the environmental audit will be completed prior to the gazettal of Amendment C256ball.

Submission 9

DFC seek to remove the proposed EAO from its landholdings upon the issue of a Certificate / Statement of Environmental Audit.

10. Sensitive Use Buffer - Landfill Gas Buffer

Plan 2: Place Based Plan of the PSP identifies a 500m sensitive use buffer to the former Wendouree landfill. The 500m buffer represents the recommended (default) buffer required to separate the former landfill from building and structures as well as sensitive land uses, as identified in the Landfill buffer guideline (EPA Publication 1950).

Section 3.0 Applications requirements, of the UGZ3, outlines the requirement for a Landfill Gas Risk Assessment to be prepared by a suitably experienced and qualified person for any applications to subdivide land or to construct a building or construct and carry out works on land for a sensitive use within the '500m landfill gas buffer' shown in Plan 2.

Given the age of the former landfill, there is a high likelihood for reduced gas and leachate emissions from the landfill and therefore, a reduction in the extent of the sensitive use buffer surrounding the former tip area.

We understand that the VPA intends to commission a Landfill Gas Risk Assessment to define the spatial extent of emissions based on field observations and ultimately, review the extent of the 500m buffer. We encourage the VPA to undertake this work as soon as is practicable as the review process can take considerable time. The study should be concluded in time to insert any revised buffer into the final amendment documents.

Submission 10

DFC encourage VPA to undertake a Landfill Gas Risk Assessment for the former Wendouree landfill as soon as practicable.

Conclusion

DFC appreciates the opportunity to make submissions to the Ballarat North PSP draft Amendment C256ball. We look forward to discussing our submissions with the VPA at your earliest convenience. Should there be further questions in relation to any of the matters made within this submission, please do not hesitate to contact [REDACTED] Structure Planning Manager via the following email [REDACTED].